

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALAN GOLDMAN,

Plaintiff

v.

MCCONNELL VALDES, LLC et al.,

Defendants

Civil No.: 24-1136 (SCC)

**DECLARATION OF MARGARET KARCHMER, ESQ. IN SUPPORT OF
MOTION FOR A PROTECTIVE ORDER AND
TO STAY DISCOVERY AS TO SOMPO**

I, Margaret Karchmer, an attorney admitted to practice before this court in the above-captioned proceeding, declare pursuant to 28 U.S.C. § 17456 as follows:

1. I am an attorney with the law firm of Wiley Rein LLP, counsel for defendants Sompo International Insurance Company and Endurance American Specialty Insurance Company (collectively, “Sompo”) in this litigation, along with Francisco E. Colón-Ramírez of Colón Ramírez LLC. I am familiar with the facts and circumstances of this matter and have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently thereto.

2. I submit this declaration in support of Sompo’s Motion for a Protective Order and to Stay Discovery as to Sompo.

3. I attended the February 27, 2025 scheduling conference in this matter with U.S. Magistrate Judge Marshal D. Morgan.

4. At this scheduling conference, Francisco M. López Romo, counsel for plaintiff, proposed a cutoff of March 28, 2025 for submission of interrogatories and requests for production of documents.

5. In response, I asked whether plaintiff intended to serve discovery to Somo and AIG International Company – Puerto Rico (“AIG” and, together with Somo, the “Insurers”). The purpose of this question was because, if plaintiff stated that he intended to serve discovery to the Insurers, I would have proposed to stay discovery as to the Insurers at this stage of the case because, if plaintiff does not prevail on his claims against the non-defendant insurers, his claims against the Insurers will be moot.

6. In response to my question, Mr. López Romo affirmatively represented that he did not intend to issue discovery to the Insurers.

7. Based on this representation, I did not object to the proposed discovery schedule because it did not directly impact Somo.

8. Attached hereto as Exhibit A are requests for the production of documents and interrogatories plaintiff issued to the Insurers on March 12, 2025 (the “Requests”).

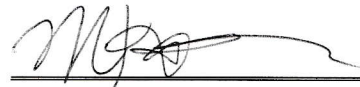
9. Attached hereto as Exhibit B are emails between Mr. López Romo and Mr. Colón-Ramírez regarding the Requests.

10. On April 3, 2025, counsel for Somo asked plaintiff’s counsel if he would agree to an extension of Somo’s time to respond to the Requests to 15 days after a ruling on this motion. Plaintiff’s counsel refused to agree to an extension.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 3, 2025.

Respectfully submitted,

Respectfully submitted,



Margaret T. Karchmer (admitted *pro hac vice*)

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